

**Exhibit A**  
**Proposed Order**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re: :  
:  
: Chapter 11  
SEARS HOLDING CORPORATION, *et al.*, :  
:  
: Case No. 18-23538-RDD  
Debtors.<sup>1</sup> : (Jointly Administered)  
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**ORDER GRANTING MOTION OF GA CAPITAL FOR ORDER SHORTENING  
NOTICE PERIOD WITH RESPECT TO APPLICATION OF GA CAPITAL FOR  
ALLOWANCE AND PAYMENT OF FEES AND EXPENSES PURSUANT TO  
BANKRUPTCY CODE SECTIONS 503(b)(3)(D) AND 503(b)(4)**

Upon consideration of the *Motion of GA Capital for Order Shortening Notice Period  
With Respect to Application of GA Capital for Allowance and Payment of Fees and Expenses  
Pursuant to Bankruptcy Code Sections 503(b)(3)(D) and 503(b)(4)* (the “Motion to Shorten”),<sup>2</sup>  
for entry of an order, pursuant to Bankruptcy Rule 9006(c), shortening the notice period with  
respect to the Application, all as more fully described in the Motion to Shorten; and the Court  
having jurisdiction to consider the Motion to Shorten and the relief requested therein pursuant to

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); SHC Licensed Business LLC (3718); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); Sears, Roebuck de Puerto Rico, Inc. (3626); SYW Relay LLC (1870); Wally Labs LLC (None); SHC Promotions LLC (9626); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Sears Brands Business Unit Corporation (4658); Sears Holdings Publishing Company, LLC. (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); and Sears Brands Management Corporation (5365). The location of the Debtors’ corporate headquarters is 3333 Beverly Road, Hoffman Estates, Illinois 60179.

<sup>2</sup> Capitalized term used but not otherwise defined herein shall have the meanings given to such terms in the Motion to Shorten.

28 U.S.C. § 1334; and consideration of the Motion to Shorten and the relief requested therein being a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion to Shorten having been provided and no further notice being required under the circumstances; and upon the Court's review of the Motion to Shorten; and upon the Court's determination that the legal and factual bases set forth in the Motion to Shorten establish just cause for the relief requested therein; and upon all of the proceedings had before the Court and after due deliberation and sufficient cause appearing therefor, it is hereby ORDERED THAT:

1. The Motion to Shorten is GRANTED as set forth herein.
2. The Application will be heard at the hearing currently scheduled for **10:00 a.m. (ET) on December 20, 2018**. Any responses or objections to the Application must be filed no later than **4:00 p.m. (ET) on December 17, 2018**.
3. GA Capital is authorized to take all actions necessary to effectuate the relief granted in this order.
4. This Court shall retain exclusive jurisdiction to hear and decide all matters arising from or related to this order.

Dated: December \_\_\_\_, 2018  
White Plains, New York

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HONORABLE ROBERT D. DRAIN  
UNITED STATES BANKRUPTCY JUDGE